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Attorneys for Defendants,
HARTFORD FIRE INSURANCE COMPANY and
SENTINEL INSURANCE COMPANY, LIMITED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FOUNDER INSTITUTE INCORPORATED,)
a Delaware Corporation,)

Plaintiff,

vs.

HARTFORD FIRE INSURANCE
COMPANY, a corporation doing business in
California; SENTINEL INSURANCE
COMPANY, LIMITED, a corporation doing
business in California; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 3:20-cv-04466-VC

**DECLARATION OF MEGAN JANEIRO
IN SUPPORT OF HARTFORD FIRE
INSURANCE COMPANY'S MOTION TO
DISMISS PLAINTIFF'S COMPLAINT
PURSUANT TO FEDERAL RULES OF
CIVIL PROCEDURE 12(b)(1) AND
12(b)(2)**

Date: October 15, 2020

Time: 10:00 a.m.

Courtroom: 4

Judge: Honorable Vince Chhabria

1 I, Megan Janeiro, state as follows:

2 1. I am an Assistant Vice President of Claims for Hartford Fire Insurance
3 Company ("HFIC"). I have responsibilities for property claims for all underwriting subsidiaries
4 of The Hartford Financial Services Group, Inc. ("HFSG"), including Sentinel Insurance
5 Company, Ltd. ("Sentinel"). The facts stated in this declaration are within my personal
6 knowledge – either directly or by virtue of my investigation into the corporate records and
7 documents maintained in the ordinary course of HFIC's business – and all such facts are true and
8 correct. This declaration is made in support of the facts asserted and contained in HFIC's Motion
9 to Dismiss Plaintiff's Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and
10 12(b)(2) ("Motion to Dismiss").

11 2. HFIC is incorporated in Connecticut with its principal place of business at
12 One Hartford Plaza, Hartford, CT 06155.

13 3. HFIC has not issued any insurance policy to Plaintiff Founder Institute
14 Incorporated and HFIC did not issue the policy attached as Exhibit A (Policy No. 57 SBA
15 BA6715 DX).

16 4. "The Hartford" is not a legal entity. Rather, "The Hartford" is a brand
17 name used by multiple, distinct entities, including Sentinel Insurance Company, Ltd.

18 I declare under penalty of perjury under the laws of the United States and the State
19 of California that the foregoing is true and correct, and that this declaration was executed on,
20
21

22 July __, 2020, at _____, _____.

23 Megan Janeiro
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1 I, Megan Janeiro, state as follows:

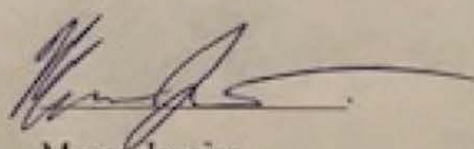
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18 I declare under penalty of perjury under the laws of the United States and the State
19 of California that the foregoing is true and correct, and that this declaration was executed on,
20

21
22 July 27, 2020, at Waterbury, CT 
23 Megan Janeiro
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